

March 13, 2006

MEMORANDUM

TO: Bill Wallace, Northwest Region Manager

FROM: Lenny Young, Forest Practices Division Manager

SUBJECT: Northwest Region Cycle 1 (Operations) Forest Practices Field Audit - Final Report

Attached please find the final report for our recently completed Northwest Region cycle 1 (operations) Forest Practices field audit. Thank you for setting a positive tone that facilitated the audit team's work. The team appreciated the openness and candor with which the Northwest Region Forest Practices staff shared information and opinions.

Overall, I am pleased with the picture the audit paints of how Northwest Region is implementing the Forest Practices Act and Rules. There are several areas in which improvement is needed; however, I do not feel that any of these are "fatal flaws" which are impairing fulfillment of our mission. Please extend my thanks to the Forest Practices staff for the fine job they are doing, day in and day out.

Some needed improvements may not be apparent until the cycle 1 audits are completed in all regions. However, the Northwest audit revealed some things that I would like you to work with Nancy and your staff to correct right away. These are as follows.

1. Documentation is currently inadequate for several aspects of program delivery. Please work to ensure that your staff appreciates the importance of documenting activities and decisions, and that all necessary documentation takes place. Areas where documentation is not adequate include:

- a. documentation of field visits to review Forest Practices Applications (FPAs): pre-approval, post-approval, and close-out; and
- b. documentation that required landowner-tribe meetings have taken place.

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2. The Forest Practices Coordinator currently only reviews Class IV-Special and Class-IV General FPAs. Please ensure that the coordinator also personally reviews any Class III FPA that requires the exercise of professional judgment, and makes any such decisions.
3. Two FPAs examined by the audit team were conditioned in a manner that exceeds DNR's authority. Both of these involved conditions related to hauling timber on county roads. Please ensure that your staff knows the scope of DNR's conditioning authority, specifically that DNR does not have regulatory jurisdiction over timber haul that does not take place on a "forest road", as that term is defined in the rules.
4. Two FPAs examined by the audit team involved cultural resources; however, there was no record that the required meeting between the landowner and the affected tribe(s) had taken place before either application was approved. An application that involves cultural resources cannot be approved unless the region has confirmed that the required meeting has taken place.
5. Foresters are attempting to informally resolve some Forest Practices violations without documenting the violation or taking appropriate enforcement action. This practice must stop immediately. Please ensure that all Forest Practices violations are documented and handled according to established procedures. I am not directing harsher treatment of violations; rather, I am directing that all violations be recorded and that enforcement action appropriate to the situation be taken.

These are the operational issues that I feel require immediate attention. The report identifies some other issues related to weak or inconsistent awareness of program procedures; please consider how to best correct these shortcomings.

On the positive side, I am impressed with several key audit findings. These include:

1. ID teams are operated according to established procedures. Successfully operating ID teams, in the TFW spirit, is a significant accomplishment that speaks well for how your staff is approaching their work.
2. FPAs are complete when accepted, processed during specific time frames, and usually correctly classified. These are basic but important aspects of program delivery.
3. Road maintenance and abandonment plans incorporate the even-flow concept to scheduling repairs. This finding is impressive given tendencies we have sometimes observed elsewhere.

There is much more in the final audit report that you can use to strengthen delivery of the Forest Practices program in Northwest Region. Please carefully consider this information, and let me know if you need support from the division to make needed improvements.

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Again, I thank you, Nancy, and your Forest Practices staff for the fine job you are doing to implement the Forest Practices Act and Rules in Northwest Region.

Attachment

c: Pat McElroy, Executive Director of Regulatory Programs
Vicki Christiansen, Region Operations Coordinator
Region Managers
Gary Graves, Forest Practices Assistant Division Manager for Operations
Nancy Joseph, Northwest Region Assistant Manager for Resource Protection & Services
Northwest Region Cycle 1 Field Audit Team